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13 **UNITED STATES BANKRUPTCY COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors.**

21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24 *All papers shall be filed in the Lead Case,
25 No. 19-30088 (DM)

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF RYAN MOONEY
IN SUPPORT OF MOTION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS PURSUANT TO 11 U.S.C.
§§ 105(a) AND 501 AND FED. R. BANKR.
P. 3003(c) FOR ENTRY OF AN ORDER
EXTENDING THE BAR DATE**

Date: November 13, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102
Objection Deadline: November 6, 2019

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

I, Ryan Mooney, declare as follows:

1. I am over 18 years of age. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify competently thereto.
2. My wife and I owned our home on Drendel Circle in Paradise, California. We purchased and moved into the home three months before the Camp Fire destroyed

our neighborhood and our entire city. Our aunt and uncle lived a few blocks away, and they also lost their home.

3. On the morning of November 8th, we awoke to the smell of smoke. We saw a wall of flames coming over the canyon. My wife and I evacuated immediately and barely escaped. We rushed to my parents' house across town to help them evacuate, as well. All of us are still grappling with the trauma to this day. We are constantly planning fire escape routes and putting together emergency kits. When there is smoke outside, we get nervous. It is difficult for us to talk about the fire.
4. After the fire, my wife and I moved from room to room in a hotel for six weeks before finding an apartment to rent in Chico, California for six months. We now live in a house in Chico away from our property in Paradise.
5. My wife Beth was a high school teacher at a local charter school in Paradise before the fire. The school burned down, temporarily reopened in Chico, then permanently closed due to lack of enrollment. Beth lost her job.
6. Our home and all our belongings were totally destroyed in the fire. Our 1.3 acres of land are charred along with a dozen dead, mature trees that cannot be replaced. The once scenic view from our property now looks out across the scorched canyon and hilltops.
7. We haven't rebuilt, but we would like to do so. We don't have the money, and we don't know what to do because the community is gone, the areas around are destitute, and the property values have dropped. I would like for my community to be rebuilt but that hasn't even started.
8. Our house was insured and I've had at least 20 phone calls with our agents. They never disclosed that my insurer was seeking reimbursement from PG&E in the bankruptcy for payments it made to us or that we had the right to pursue our own claim against PG&E for our losses and emotional distress. Our insurance claim is still open. I recently learned that the insurance companies in this bankruptcy

settled for around \$10 billion and that was insulting and frustrating to me because my insurer is taking so long to settle our insurance claim.

9. I also did not know we could recover money from PG&E for our losses. I do not recall receiving any notice through the mail or a phone call from PG&E regarding our rights in the bankruptcy. I became aware that there is money available in this case through Facebook. I saw attorney commercials on television, but they didn't mean anything to me. Had I not luckily learned about this through Facebook, I never would have filed a claim.

10. I now have an attorney. I now intend to pursue a claim to cover all our damages.

11. I submit this declaration because I believe there are countless people who like me don't know that they should be filing claims in this bankruptcy or what they will lose if they don't. I feel horrible for these people, and I ask the court to do something to let them participate too.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
6th day of October, 2019 in Chico, California.

Am. W.

Ryan Mooney